

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

KATHLEEN P. MULLINIX,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 04-12684-WGY
v.	)	
	)	
KIKI BOGORAD-GROSS and	)	
LEONARD P. BOGORAD, As They	)	
Are Executors of the Will of	)	
Lawrence Bogorad,	)	
	)	
Defendants.	)	
	)	

**DEFENDANTS' MOTION FOR A PROTECTIVE ORDER**

Defendants Kiki Bogorad-Gross and Leonard Bogorad (collectively, "Defendants"), as they are Executors of the Will of Lawrence Bogorad, by their attorneys, Sullivan & Worcester LLP, respectfully move this Court, pursuant to Fed. R. Civ. P. 26(c), for the entry of a protective order in the form attached hereto as **Exhibit A**. The proposed protective order properly limits the scope of discovery and protects the Defendants from discovery tactics designed to hurt and harass the Defendants. In support of this motion, Defendants submit the separate Memorandum in Support of Defendants' Motion for a Protective Order.

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WHEREFORE, Defendants respectfully request that the Court enter a protective order in the form attached hereto as **Exhibit A**.

REQUEST FOR ORAL ARGUMENT

KIKI BOGORAD-GROSS and  
LEONARD P. BOGORAD, as  
they are the Executors of the Will  
of Lawrence Bogorad

By their attorneys,

February 10, 2006

/s/ Larry L. Varn  
\_\_\_\_\_  
Larry L. Varn (BBO # 508130)  
Lisa M. Hodes (BBO # 660444)  
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lhodes@sandw.com

**FEDERAL RULE 26(c) AND LOCAL RULES 7.1(A)(2) AND 37.1 CERTIFICATE**

Counsel for Defendants has made a good-faith effort to resolve this dispute without court action. Counsel for Defendants and counsel for Plaintiff have exchanged emails and have held multiple phone conferences, but have been unable to reach agreement.

/s/ Lisa M. Hodes  
\_\_\_\_\_

Certificate of Service

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on February 10, 2006.

/s/ Lisa M. Hodes  
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## EXHIBIT A

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

KATHLEEN P. MULLINIX,	)	
	)	
Plaintiff,	)	
	)	Civil Action No. 04-12684-WGY
v.	)	
	)	
KIKI BOGORAD-GROSS and	)	
LEONARD P. BOGORAD, As They	)	
Are Executors of the Will of	)	
Lawrence Bogorad,	)	
	)	
Defendants.	)	
	)	

**PROTECTIVE ORDER**

It is HEREBY ORDERED that the following Protective Order be entered pursuant to Rule 26(c) of the Federal Rules of Civil Procedure.

IT IS HEREBY ORDERED THAT:

1. Further depositions by Plaintiff Kathleen P. Mullinix are precluded absent a certification from Plaintiff's counsel or an affidavit from the Plaintiff that all documents responsive to Defendants' First Set of Document Requests have been produced.
2. Inquiries related to the extent and duration of the personal relationship between Plaintiff and the late Professor Lawrence Bogorad are prohibited.
3. Further discovery of documents belonging to the Estate of Lawrence Bogorad is prohibited.
4. This Protective Order shall remain in full force and effect after the termination of this litigation, or until canceled or otherwise modified by order of this Court.

**SO ORDERED.**

Dated: \_\_\_\_\_